

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

CARL LLOYD TRUE,

*Defendant.*

### CRIMINAL COMPLAINT

Case No. 22-MJ-201-JAR

I, Adam Good, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about June 24<sup>th</sup>, 2022, in the Eastern District of Oklahoma, **CARL LLOYD TRUE** committed the crimes of False Statement During the Acquisition of a Firearm in violation of 18 U.S.C. § 922(a)(6) and Receiving a Firearm While Under Indictment for a Felony Offense in violation of 18 U.S.C. § 922(n).

I further state that I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives and that this complaint is based on the following facts:

(See attached Affidavit of Task Force Officer Adam Good, which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.



Adam Good  
Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: July 6, 2022

JASON A. ROBERTSON

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer



Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Adam M. Good, being duly sworn, depose and state that:

**INTRODUCTION**

1. I am a Task Force Officer (“TFO”) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), and I am currently assigned to the Tulsa Resident Agency. I am a “federal law enforcement officer” within the meaning of Federal Rules of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request and execute search warrants. I have been a law enforcement officer since 2006. I am currently employed by the District 22 Drug and Violent Crime Task Force serving Pontotoc, Seminole and Hughes Counties in Oklahoma. I became a Task Force Officer (“TFO”) for the ATF in January 2022. My responsibilities as a TFO include the investigation of possible violations of state and federal law, including narcotics violations, federal firearm violations, various violent crimes, arson, and the apprehension of fugitives. During my career, my investigations have included the use of various surveillance techniques and the execution of various search, seizure, and arrest warrants.

2. The statements contained in this Affidavit are based in part on information provided by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, independent investigation, and my experience, training, and background as a Task Force Officer with the ATF. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that **Carl Lloyd TRUE** a white male, DOB: 02/XX/1967<sup>1</sup>, SSN: XXX-XX-9300, committed the below-described

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<sup>1</sup> TRUE’S complete date of birth and social security number are known to investigators but redacted here.

offenses, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

**PROBABLE CAUSE**

4. This Affidavit is intended to show there is sufficient probable cause for a Complaint and Arrest Warrant and does not set forth all my complete knowledge about this matter. As will be shown below, there is probable cause to believe the defendant **Carl Lloyd TRUE** committed the crimes of False Statement During the Acquisition of a Firearm in violation of 18 U.S.C. § 922(a)(6) and Receiving a Firearm While Under Indictment for a Felony Offense in violation of 18 U.S.C. § 922(n).

5. The facts and circumstances alleged in this affidavit occurred within the boundaries of the Eastern District of Oklahoma.

6. On June 1, 2022, **TRUE** was arrested by the Hughes County Sheriff's Office for obstructing law enforcement officers during an investigation that included allegations that he had assaulted his wife, G.T. and stepdaughter, T.H., at 7845 EW 121 near Wetumka, Hughes County within the Eastern District of Oklahoma. Officers saw **TRUE** physically strangling T.H. on their arrival and had to use force to stop **TRUE**.

7. On June 3, 2022, G.T. and T.H. petitioned the Hughes County District Court for orders of protection against **TRUE** based upon the assault and strangulation. The court issued emergency orders of protection in case PO-22-35 and PO-22-36 respectively. A hearing date was set for June 8, 2022, at 9:00 AM by Judge Chris Anderson. The Hughes County Sheriff's Office personally served **TRUE** with a copy of the emergency protective orders and notice of hearing on June 2, 2022.

8. The court held a hearing on June 8, 2022, but **TRUE** did not appear. The Court entered final orders of protection against **TRUE** on behalf of G.T. and T.H. that are in effect until June 8, 2023. The orders contained a warning that possession of a firearm or ammunition by a defendant while the orders were in effect could result in prosecution for violations of Federal law. The orders specifically prohibited **TRUE** from having any contact with G.T. and T.H. Further, the orders prohibited **TRUE** from harassing, stalking, threatening, or engaging in conduct that would place G.T. and T.H. in reasonable fear of bodily injury. Additionally, the orders prohibited **TRUE** from the use, attempted use, or threatened use of physical force against G.T. and T.H. The court also determined that **TRUE** represented a credible threat to the physical safety of G.T. and T.H. Finally, the orders held that the parties involved were either an intimate partner or child of such intimate partner or person.

9. On June 6, 2022, the Hughes County District Attorney filed a felony information against **TRUE** for Domestic Assault and Battery by Strangulation in violation of Oklahoma law 21 O.S. § 644(J) and Obstructing an Officer in violation of 21 O.S. § 540. The crime of Domestic Assault and Battery is punishable by 1 to 3 years imprisonment, and this was so indicated on the information. Judge Trisha Smith ordered **TRUE** detained in the Hughes County Jail in lieu of a \$10,000 bond. The court also entered a minute finding that **TRUE** was explained his rights related to the charges and knowingly and intelligently understood his rights. On June 7, 2022, **TRUE** posted a \$10,000 bail bond and signed acknowledging that his next court date was June 21, 2022. **TRUE** retained attorney Ben Munda, who entered an appearance in the case on June 21, 2022. **TRUE** appeared in Hughes County District Court on June 21, 2022, with his attorney where the matter was continued until August 2, 2022.

10. On June 24, 2022, **TRUE** went to Prepper's Gun Store, 35933 Highway 9, near Seminole in the Eastern District of Oklahoma. Prepper's Gun Store is a Federal Firearms Licensee

(“FFL”). **TRUE** purchased a Rexio RJ-38 .38 special revolver with serial number 067856 through [www.gunbroker.com](http://www.gunbroker.com) and had it shipped to Prepper’s for an official transfer via ATF Form 4473. **TRUE** saw a Smith and Wesson SW1911 .45 caliber handgun with serial number UCX1545 in the sale case and decided to purchase it. **TRUE** completed ATF Form 4473 where he provided his name, date of birth, address, and social security number. He answered “no” in section 21, which related to any prohibitions of firearm possession including: “[a]re you under indictment or information in any court for a felony, or any other crime for which the judge could imprison you for more than one year...” and “[a]re you subject to a court order... restraining you from harassing, stalking, or threatening your child or an intimate partner or child of such partner?” He then signed the form declaring all of his answers were correct. The FFL contacted the National Instant Criminal Background Check System (“NICS”) which provided a code to proceed with the sale. **TRUE** purchased both handguns along with assorted .45 caliber ammunition and left the store.

11. On June 27, 2022, **TRUE** was stopped on a traffic stop and arrested by the Atoka Police Department for obstructing an officer and was transported to the Atoka County Jail. **TRUE** remarked that “you might have saved my life. I’m going after Blake Shelton.” The officer located a holster, but no firearms on **TRUE**’s person or in his vehicle.

12. On June 29, 2022, I conducted a post *Miranda* warning interview with **TRUE** at the Atoka County Jail. He acknowledged purchasing the firearms at Prepper’s Gun Store and completing ATF Form 4473. He said he didn’t lie on the form because his stepdaughter had recanted the story via text message. He explained that he left the guns on J.R.’s property near Wetumka and provided driving directions on how to get there. He said he left the Smith and Wesson SW1911 on the dash of Toyota 4Runner and the Rexio RJ-38 in a pile of scrap metal.

13. I contacted the Hughes County Sheriff’s Office, provided the driving directions, and requested they attempt to recover the firearms on my behalf. Investigator S.W. was able to

determine the address was 7726 EW 1240 near Wetumka in Hughes County, Oklahoma. He went to the location where he met with the resident, J.R. J.R. stated that he knew **TRUE** and agreed to allow law enforcement to search for the firearms. Investigator S.W. located the Smith and Wesson SW1911 on the dash of a Toyota 4Runner on the property and seized it. He then searched a pile of scrap metal that **TRUE** described but did not find the Rexio RJ-38. However, he did locate one hundred twenty-five (125) assorted live .45 caliber rounds of ammunition and seized them.

14. On June 30, 2022, J.R. called the Hughes County Sheriff's Office stating that he had located the Rexio RJ-38. J.R. found the firearm discarded in his yard in a retail box. Investigator S.W. retrieved the firearm, box, and paperwork and turned it over to me. The box contained invoices to **TRUE** related to the sale of the firearms and ammunition.

15. Special Agent Lucas Keck examined the seized firearms and ammunition. He determined that the Smith and Wesson SW1911 .45 caliber handgun with serial number UCX1545, the Rexio RJ-38 .38 special revolver with serial number 067856, and assorted .45 caliber ammunition had not been made in Oklahoma and had traveled in either foreign or interstate commerce.

### **CONCLUSION**

16. That to the best of my knowledge and belief, all statements made in this affidavit are true and correct. Based on the foregoing facts, a review of this case, and based on my knowledge and experience with firearms crimes, I, as your Affiant have probable cause to believe **Carl Lloyd TRUE** committed the offenses described herein.

Respectfully Submitted,



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Adam M. Good  
Task Force Officer  
Bureau of Alcohol, Tobacco and Firearms

Sworn before me this 6 day of July, 2022.

A handwritten signature in blue ink, reading "Jason A. Robertson", with a long horizontal flourish extending to the right.

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HONORABLE JASON A. ROBERTSON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF OKLAHOMA